

Exhibit 4

1
2 IN THE UNITED STATES DISTRICT COURT
3 FOR THE DISTRICT OF SOUTH CAROLINA
COLUMBIA DIVISION

-----x

4 THE SOUTH CAROLINA STATE
5 CONFERENCE OF THE NAACP

6 and

7 TAIWAN SCOTT, ON BEHALF OF HIMSELF
8 AND ALL OTHER SIMILARLY SITUATED
PERSONS,

Case No.
3:21-CV-03302
JMC-TJH-RMG

9 Plaintiffs,

10 Vs.

11 THOMAS C. ALEXANDER, IN HIS OFFICIAL
12 CAPACITY AS PRESIDENT OF THE SENATE;
13 LUKE A. RANKIN, IN HIS OFFICIAL CAPACITY
14 AS CHAIRMAN OF THE SENATE JUDICIARY
15 COMMITTEE; MURRELL SMITH, IN HIS OFFICIAL
16 CAPACITY AS SPEAKER OF THE HOUSE OF
17 REPRESENTATIVES; CHRIS MURPHY, IN HIS
18 OFFICIAL CAPACITY AS CHAIRMAN OF THE
19 HOUSE OF REPRESENTATIVES JUDICIARY
20 COMMITTEE; WALLACE H. JORDAN, IN HIS
21 OFFICIAL CAPACITY AS CHAIRMAN OF THE HOUSE
OF REPRESENTATIVES ELECTIONS LAW
SUBCOMMITTEE; HOWARD KNAPP, IN HIS
OFFICIAL CAPACITY AS INTERIM EXECUTIVE
DIRECTOR OF THE SOUTH CAROLINA STATE
ELECTION COMMISSION; JOHN WELLS, JOANNE
DAY, CLIFFORD J. EDLER, LINDA MCCALL,
AND SCOTT MOSELEY, IN THEIR OFFICIAL
CAPACITIES AS MEMBERS OF THE SOUTH
CAROLINA STATE ELECTION COMMISSION,

Defendants.

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22 STENOGRAPHIC REMOTE VIRTUAL DEPOSITION
23 CHARLES TERRENI
24 Tuesday, August 16, 2022
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TERRENI

A. Well, yeah. I mean there were some lawyers I'm sure that communicated with the community and with me. Dale Oldham was one of them. I'm trying to think if there was anybody else. That was it I believe.

Q. Who does Dale Oldham work for?

A. That's a good question. I don't know.

Q. Did you communicate with him?

A. Yeah.

Q. How often?

A. Rarely. He called me after his staff plan was released one or two times and I'm talking about communicating with him about congressional redistricting.

Q. Did you talk to him about noncongressional redistricting?

A. Yeah.

Q. Such as?

1 TERRENI

2 A. A boat. I didn't talk to
3 him very often but I have known Dale
4 for a long time. I'm sure he wished
5 me a Merry Christmas and that kind
6 of thing.

7 Q. How long have you known
8 him?

9 A. 30 years.

10 Q. And you don't know -- I'm
11 sorry, do you know who he works for?

12 A. I do not. I know he works
13 for some national Republican
14 organization. The National
15 Republican Redistricting Trust has
16 been mentioned in the discovery that
17 I have seen. I don't know if he
18 works with them or not. I have no
19 idea.

20 Q. So you talked to him one or
21 two times after the staff plan
22 released and we earlier discussed
23 that that was around November of
24 2021. Is that when you recall
25 talking to him?

1 TERRENI

2 A. I think so, yes.

3 Q. And only those one or two
4 times?

5 A. Again, if we are talking
6 about congressional, yes. Only
7 those one or two. It was a couple
8 of calls.

9 Q. Who else was on those
10 calls?

11 A. No one.

12 Q. How long did they last?

13 A. Couple minutes.

14 Q. Did you correspond by
15 email, text or some other means
16 after or around those conversations?

17 A. He sent me a couple of text
18 messages.

19 Q. Did you turn those over in
20 discovery in this case?

21 A. Yes.

22 Q. Do you know -- more than
23 five texts messages, around how
24 many?

25 A. I think it was just two or

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three.

Q. What was the nature of those texts?

A. As I recall, he texted us something to the effect of having a plan that he thought, just having a plan that he wanted us to see. There was a second text, if I recall, just from the exhibits you shared that -- says something about he had some political data that was different from the data we had posted our website. Those were the texts.

Q. Is your position that he reached out to you initially or did you reach out to him regarding congressional maps?

A. He reached out to me.

Q. And is it your position that he does not work for the South Carolina Senate this congressional cycle?

A. My position? I'm not aware

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that he works for the -- whoa, whoa, whoa. I'm not aware that he worked for the -- that's right, I'm not aware that he worked for the South Carolina Senate during this congressional cycle.

If you want me to expand, I am aware that he did some work on a Senate Republican caucus during the Senate phase of redistricting, just to be clear.

Q. Now, you said he wanted us to see our maps, some maps on that. Who was us that you are referring to?

A. Senate -- Senate Judiciary staff.

Q. And did he ultimately send you that information?

A. Yes.

Q. And he sent that to you by email?

A. Not me by email. He would have -- he did not send anything but

1 TERRENI

2 he -- Adam Kincaid, who I understand
3 to be with the National Republican
4 Redistricting Trust, I believe, had
5 to send us the file. And he needed
6 to transfer it by gmail or by Google
7 Drive because it was a big file.
8 And he did it by sending it to Andy
9 Fiffick at a gmail address.

10 Q. Did you tell Oldham to send
11 it to Mr. Fiffick?

12 A. I didn't tell Oldham to
13 send it to Mr. Fiffick. I think at
14 some point during this conversation
15 I believe he would have been in the
16 room, we were looking for a gmail
17 address that this individual could
18 use and Andy probably volunteered
19 his gmail address so that the file
20 could be transferred.

21 Q. So Oldham calls you and
22 said he has some maps that he wants
23 the Senate Judiciary to look at.
24 Does he identify at that time that
25 those maps would come from the

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National Republican Redistricting
Trust?

A. No. I don't think so. I
mean I understood them to come from
some Republican entity but I wasn't
familiar with the National
Redistricting Trust per se.

Q. Did you tell him at that
time to send them to the Senate
redistricting email that had been
publicized to the rest of the
public?

A. I told him he could but he
wanted us to see them. We had
already published the staff plan and
he said, well, I'd like to send,
something to the effect, I don't
remember the exact conversation,
that he wanted us to see them and
wanted us to see them quickly so we
gave him that email address.

Q. I want to look at what was
submitted as tab 50 which is a text
exchange between Mr. Oldham and

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another person from November 23,
2021, that said South Carolina
Senate 4343. And that would be
Plaintiffs' Exhibit 1.

(Plaintiffs' Exhibit 1, Text
exchange, marked for
identification, as of this date.)

A. I'm sorry, tab 50?

Q. Yes.

A. Okay. All right.

Q. You have that in front of
you?

A. I do.

Q. Is this -- do you recognize
this text exchange?

A. Yes.

Q. Is this one of the texts
that you received from Mr. Oldham?

A. Yes.

Q. So this 803-530-2893 number
is yours?

A. It is.

Q. Is this your personal cell
phone, a work cell phone, what is

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this?

A. It's both, my cell phone.

Q. And you used this cell phone for Senate redistricting purposes, this cycle?

A. Among other things, yes.

Q. Do you also receive emails around your other business with your law firm on this same cell phone?

A. Yes.

Q. So this is not a cell phone designated just for the Senate, your work with the Senate this redistricting cycle?

A. No, ma'am.

Q. And this is one text exchange, some of it is redacted. Is this the sum total of texts that you had with Mr. Oldham?

A. About congressional redistricting or in general?

Q. About congressional redistricting.

A. Sorry, I'm just trying to

1 TERRENI

2 look at it all.

3 I think so.

4 Q. So looking at the November
5 19, 2021, 9:38 a.m. text, Dalton
6 Oldham reads -- sends a text to you
7 that says: "Call me. Want to know
8 if you/Andy has it."

9 A. Um-hmm.

10 Q. Do you know what he's
11 referring to here?

12 A. I believe he's referring to
13 that plan -- he sent three plans at
14 one point and then he sent another
15 plan later on. I believe this would
16 refer to the first two plans that he
17 sent.

18 Q. Okay. We are going to look
19 at those because those were sent on
20 November 18th, I believe?

21 A. That would make sense.
22 Around that time.

23 Q. I'm sorry to interrupt you.

24 A. No, I just said that makes
25 sense, around that time. I don't

1 TERRENI

2 Q. Yes.

3 A. Yes, I have it.

4 Q. From Adam Kincaid to Andrew
5 Fiffick.

6 A. Yes, ma'am.

7 Q. So you've seen this before?

8 A. Yes.

9 Q. Before even I sent it?

10 A. Before you sent it, yes.

11 Q. When did you see it?

12 A. I think in the process of
13 discovery.

14 Q. Is this the two maps that
15 you believe Mr. Oldham was referring
16 to in the text exchange that we just
17 went over?

18 A. I believe so, yes, ma'am.

19 Q. And it's your position,
20 correct me if I'm wrong, that in
21 speaking to Mr. Oldham you told him
22 that he could communicate to NRRT,
23 that they could share these maps
24 with Mr. Fiffick at his gmail?

25 MR. GORE: Object to form.

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A. Mr. Oldham or Mr. Kincaid, whoever, needed an email address with which to share these maps. And I believe, I don't specifically recall, that we provided -- I provided it to him probably. I just know that Mr. Oldham called, he wanted to share these maps with us, we allowed him to do so.

Q. Did you know Mr. Kincaid before he sent these emails?

A. No, ma'am.

Q. Have you talked to Mr. Kincaid on the phone?

A. No.

Q. Have you emailed separately with Mr. Kincaid about congressional redistricting?

A. No.

Q. So Mr. Oldham is the go-to to NRRT as far as you are concerned?

A. No. Mr. Oldham -- I don't have a go-to to NRRT.

Q. But Mr. Oldham is the

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connection between NRRT and the
Senate with regard to these maps?

A. Yeah.

MR. GORE: Objection.

Mischaracterizes his testimony.
You can answer.

A. Yeah.

Q. Can you read the subject of
this email, the one from
November 18, 2021, at 10:05 p.m.?

A. A and B.zip.

Q. Item shared with you A and
B.zip, is that accurate?

A. Yes, ma'am.

Q. And did you ultimately
review what was in the A and B.zip?

A. Yes.

Q. What was in there?

A. Two maps.

Q. Do you know if those maps
are referred to or have been
referred to as the Wren and Palmetto
maps?

A. I believe they have.

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Q. And do you know -- how did you come to see them, can you describe what you understand happened once this Adam Kincaid sent Mr. Fiffick this zip file, how did it go from there to you seeing them?

A. One way or another the files were conveyed to Will Roberts who loaded them in the Maptitude software so that we could look at them.

Q. And by saying we looked at them, who was that?

A. Generally Mr. Roberts, me, Mr. Fiffick, Breeden John may have been there. I don't believe anybody else specifically but...

Q. Do you know if these maps were shared with Jones Day?

A. I don't recall. I think so.

Q. Did you share them with Jones Day?

A. I don't remember.

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Q. How would you have shared them with Jones Day? Via email?

A. I don't think I would have shared them with Jones Day, it would have been -- I would have had Mr. Roberts or somebody send it to Jones Day, if we did it. I just don't remember this.

Q. Why would you have sent them to Jones Day for what purpose?

A. Because they were submitted to the Senate -- they were represented as having some political consensus behind them and so just for general informational purposes.

Q. Political consensus of who?

A. The congressional delegation. Specifically the Republican congressional delegation. Mr. Oldham told me they had worked with the Republican congressional delegations on some maps or map delegation singular or rather he had said they worked on the delegations

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TERRENI

-- with the delegation on maps. I asked him if the delegation included Mr. Clyburn. He said no, this is the Republican delegation and that was it. That's what he told me.

Q. And by -- so that means that -- did you understand that to mean that Mr. Oldham had communicated with all six members of the congressional delegation but Representative Clyburn on this map or both of these maps?

A. I understood Mr. Oldham to represent that the maps were acceptable to the six members of the delegation. We did not discuss whether he individually communicated with each member or whether he communicated with the staff or he didn't do a role call. Just what he said.

Q. Are you aware of whether -- are you aware that there were other maps submitted by the public

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proposing congressional lines of
this cycle?

A. Yes.

Q. Are you aware whether those
maps were submitted to Jones Day?

A. I imagine Jones Day was
made aware of various maps that were
submitted. I don't want to go in --
I don't think it's appropriate,
unless my attorney tells me so, to
go through each map that I submitted
to Jones Day, but yes Jones Day was
generally made aware of maps that
were submitted to the Senate.

Q. How many maps did you share
with Jones Day?

A. I don't know how many maps
I individually shared with Jones Day
again -- I mean it could have been
anybody on Senate staff. I mean if
you are saying physically shared,
probably not many because Will
Roberts would have been the logical
person to do it. I'm speculating

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here. I just don't -- I mean are you asking me you if we, collectively, the Senate staff shared maps with Jones Day, yes. The logistics of it, I'm sorry, I don't remember.

Q. How did you determine which maps you would have shared, you collectively, the Senate, with Jones Day?

A. Maps that I thought had some particular political significance perhaps at a constituency that would have made them likely to adopt or the member had some concerns about or had questions about or was interested in. If someone -- I mean that's a general answer but it's pretty much accurate.

Q. How would a nonpartisan organization have factored into your calculus of a map that had political significance?

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A. They certainly could have. League of Women Voters was very active, well respected participant in the process. I'm sure we paid close attention to their maps.

Q. Do you recall specifically sharing the League of Women Voters map with Jones Day?

A. Again, I'm not trying to be picky here but do I recall me specifically sharing it, no. Did we share it with Jones Day, probably so. Jones Day also could have accessed it from the website. I mean they are all posted.

Q. How many publicly submitted maps are you aware were proposed by the public that were posted on the Senate's website?

A. I believe all of them.

Q. Excuse me?

A. I believe all of them, at least the ones that were submitted by the submission deadline.

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Q. But how many were there, were there more than five, more than ten, more than 20? Do you have any sense of how many publicly submitted maps there were?

A. It was more than five. May have been more than ten. I don't recall. We can look at the website and see.

Q. But based upon your previous testimony is it your position that not you or the Senate staff collectively would not necessarily have shared each of those maps with Jones Day, you would have made some determination about which ones you would have selected to send to Jones Day, whether or not they looked at them separate -- all of them separately or not you made a selection of some not all of the maps to be submitted to Jones Day?

MR. GORE: Objection.

Mischaracterizes testimony. Go

1 TERRENI

2 ahead. You can answer.

3 A. Well, we did not share
4 every map with Jones Day. That
5 obviously involved some editorial
6 function which we exercised in
7 sending maps to Jones Day. We did
8 not send every map to Jones Day.

9 Q. The calculus for which maps
10 you would send to Jones Day was
11 essentially whether or not you
12 thought, you collectively thought
13 that a map had some political
14 significance, was likely to be
15 adopted or a member would be
16 interested in, those were the
17 contours of how you determine which
18 maps you would pick and potentially
19 submit to Jones Day?

20 A. Those would be some of the
21 reasons, yes, for sending maps to
22 Jones Day, yes.

23 Q. Looking at tab 58, and I
24 sent you 57, 58 is the associated
25 stats for the Wren map. I think we

1 TERRENI

2 added it to that share point file.
3 Do you see a number 58 in that file?

4 A. No, ma'am. I had to
5 download those exhibits so if you
6 added it afterward, you sent them to
7 us. For whatever reason I don't
8 have it.

9 MS. ADEN: John, could you
10 screen share it, 58.

11 MR. GORE: I'm not sure I have
12 it either. I'm checking to see if
13 I have it, but I'm not certain that
14 I do.

15 Q. It also should be -- have
16 uploaded in Veritext.

17 MR. GORE: If Andrew or John
18 Cusick has it and can share it,
19 that might be a little easier.

20 MS. ADEN: Yeah. It's South
21 Carolina 26635, that's the Bates
22 stamp number. John, you can let me
23 know if you have it.

24 MR. CUSICK: Yup. I'm about
25 to pull it up in one second. Oh,

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unfortunately -- maybe we can go
off record for a moment just
because the host disabled
participant screen sharing.

MS. ADEN: Mr. Gore, do you
need a minute to talk with your
client about this?

MR. GORE: Yeah. Let's take a
minute.

(Whereupon, there is a recess
in the proceedings.)

(Plaintiffs' Exhibit 3, Wren
plan, Bates South Carolina Senate
26635, marked for identification,
as of this date.)

Q. So you have had a chance to
look at South Carolina Senate 26635,
tab 58. This is identified in the
top left-hand corner as the Wren
plan.

Have you seen this document
before?

A. I don't remember.

Q. Looking at this document

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would this have been something prepared by the South Carolina Senate during the redistricting process or does this look like a document prepared by someone outside of the Senate?

A. It likely was prepared by the Senate. It was definitely prepared by somebody with Maptitude. We used Maptitude. And so I assume it's a Senate document.

Q. Were population summaries like these something you regularly saw during consideration of congressional plans?

A. Among others, yes.

Q. And this summary includes information about total population; is that correct?

A. Yes.

Q. And deviations from equality amongst the seven congressional districts in total numbers and even percentages; is

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that correct?

A. Yes, ma'am.

Q. And does it also report racial demographic information?

A. It does.

Q. Okay. I want to focus on the percentage of non-DoJ black Hispanic people identified in this chart, which is the far right column.

Are you familiar with the category non-Hispanic DoJ black?

A. Generally, yes.

Q. What do you understand it to mean?

A. What I understand it to mean is when we at the outset of the process settled on a metric for a percentage of black population for redistricting we had to pick one of the measures. And for consistency's sake we tried to, as I recall, we tried to replicate the measure that was used by the Department of

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Justice in the 2010-cycle, which would have been non-Hispanic DoJ black.

Q. Do you understand that category to include people who self-identify as black on the census but do not identify as Hispanic in addition?

A. Yes, ma'am.

Q. Are you familiar with a category called any part black that the census reports?

A. I am.

Q. What do you understand about that category?

A. If a respondent in that category identifies any part as black they will be any part black, meaning you could be Hispanic and black and identify as -- and that would be included in AP black.

Q. I have not asked you, were you born in South Carolina?

A. No, ma'am.

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Q. Where were you born?

A. In Italy.

Q. Did you live in Italy for any period of time after you were born?

A. Yes, ma'am.

Q. For how long?

A. I lived in Italy until I was eight. I lived in Belgium for another three years, moved to the States when I was 11.

Q. Do you have dual citizenship?

A. Yes, ma'am.

Q. And have you -- when you moved to the States when you were around 11 where did you move to?

A. Columbia.

Q. South Carolina?

A. Yes, ma'am.

Q. Have you lived in Columbia, South Carolina since that time?

A. I have.

Q. In South Carolina would you

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say that you are familiar -- strike that.

Based upon having lived in South Carolina for the better part of your life and your professional experience would you expect the difference between the non-Hispanic DoJ black category and the any part black category in South Carolina to have wide disparities?

A. No.

Q. So you expect them to be similar in number in South Carolina?

A. Generally, yes.

Q. Looking at this Wren plan this is one of the plans -- these are statistics for one of the plans, we don't have a map associated with this statistical summary, but this is one of the statistical summaries from one of the plans that Adam Kincaid sent to Andy Fiffick, is that fair to say?

A. Yeah.

1 TERRENI

2 Q. Okay. Looking at the
3 summary how many of the seven
4 congressional districts reflected
5 within it have a non-Hispanic DoJ
6 black population that is above
7 50 percent?

8 A. None.

9 Q. What is the district that
10 has the highest percentage of
11 non-Hispanic DoJ black voters in
12 this Wren plan?

13 A. District 6.

14 Q. Is that the current
15 district represented by
16 Representative Clyburn?

17 A. Yes, ma'am.

18 Q. And is he the only black
19 congressional representative in
20 South Carolina?

21 A. Yes, ma'am.

22 Q. And in at least the past
23 two decades has he been the only
24 black congressional representative
25 in South Carolina?

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A. I don't remember when Senator Scott was elected to the Senate or was appointed to the Senate by Congress whether that was in the past two decades or not, but other than Congressman Scott if he would fall in that time period, yes.

Q. And the federal Congress is Representative Clyburn the only black representative that has been elected in at least the past two -- strike that.

Outside of CD 6 what is the -- can you read the percentages of black voters in each of the other districts, the approximate percentages? So let's start with CD 1, what is the percentage of black voters?

A. 18.04 percent.

Q. What about CD 2?

A. 24.89.

Q. And CD 3?

A. 18.18.

1 TERRENI

2 Q. CD 4?

3 A. 18.54.

4 Q. CD 5?

5 A. 25.39.

6 Q. And CD 7?

7 A. 26.81.

8 Q. So is it fair to say in the
9 Wren plan the lowest BVAP population
10 is in CD 1?

11 A. Yes.

12 Q. And the highest is in CD 7
13 15 27 percent, is that fair to say?

14 A. No, it would be in
15 District 6.

16 Q. Oh, the second highest.
17 I'm sorry. The second highest
18 outside of CD 6 was that in CD 7 as
19 26 percent?

20 A. Yes, ma'am.

21 Q. Yes -- I think I cut you
22 off. Yes or no?

23 A. Oh, I'm sorry, yes.

24 Q. What else do you recall
25 about seeing the Wren plan? In

1 TERRENI

2 particular, what was your reaction
3 to it when you saw this map?

4 A. I didn't think it was
5 viable. We had already produced a
6 staff plan which I don't believe had
7 been posted to the website at that
8 point but we had already had a plan
9 that we were going to bring to the
10 subcommittee as a working start.
11 And I looked at both of those plans,
12 Wren, and maybe it was Palmetto,
13 very briefly and thought their
14 shapes were messy and were not an
15 improvement over this back plan.

16 Q. Did you communicate that
17 feedback about the Wren or the
18 Palmetto to Mr. Oldham?

19 A. Yes.

20 Q. Over a phone call?

21 A. Yes.

22 Q. Did you communicate that
23 feedback -- and did you ask him to
24 communicate that feedback to NRRT,
25 Mr. Kincaid in particular?

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A. No.

Q. Did you receive guidance from Jones Day about the Wren plan before you communicated it back to Mr. Oldham?

A. I don't believe so.

Q. Do you have any reason to dispute that in this map Sumter is split, Sumter as a county is split?

A. I don't know.

Q. What about Orangeburg, do you recall whether Orangeburg was split as a county in this Wren plan?

A. If you showed me the map, I could, but I don't know. I can't -- from memory, no, I don't have any recollection.

Q. Do you have any recollection of how Beaufort was treated in this Wren plan?

A. No.

Q. And what about Charleston, the County of Charleston, do you have any recollection of how

1 TERRENI

2 compliance with that process. That
3 doesn't mean that other people might
4 have walked in and said I'm thinking
5 about a map, especially if it was
6 something that was represented as
7 being from a member of the
8 congressional delegation. Did we
9 want to see it? Sure. But I don't
10 know because I wasn't present at
11 that meeting, but Dalton Tresvant
12 may have done the same thing for
13 Congressman Clyburn, that wouldn't
14 have been unusual in my experience
15 in redistricting.

16 If we had somehow used these
17 maps that is before as the basis for
18 something we proposed to the South
19 Carolina Senate for its
20 consideration with the subcommittee,
21 I believe we literally said, hey, we
22 got this map, you know, it has
23 congressional input and style. We
24 didn't think it -- we didn't think
25 it was useful. We didn't think it

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was anything that was going to cause us to change anything so basically, you know, we took the email, we loaded the map, looked at it, put it aside. I mean we were trying to move on.

Q. But you are making the decision about whether it was the basis for anything that you did. The public has no way to analyze whether or not it was the basis for anything that you've done because they have never seen the Jessamine, the Wren or the Palmetto map; is that correct?

A. Yeah.

Q. Did you share the Jessamine map with Jones Day?

A. I don't recall.

Q. Are you aware of anyone who shared the Jessamine map with Jones Day?

A. I don't recall.

Q. Did you direct anyone to

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share the Jessamine map with Jones Day?

A. Again, I don't recall. It wasn't that significant. It's very possible I didn't bother.

Q. Did you share the Jessamine map or direct anyone to share the Jessamine map with any Senate leadership?

A. I don't remember. I don't think so.

Q. Do you recall asking any Senate staff to share the Jessamine map with any Senate leadership?

A. No, ma'am.

Q. After receipt of the Jessamine map did you speak with Mr. Oldham again about the map?

A. I don't recall. I probably did.

Q. Did you provide him feedback on the Jessamine map like you did with respect to the Palmetto and Wren map?

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A. Well, I probably said Dale, I'm sorry, we are just going to move on. These were not detailed discussions.

Q. Looking at tab 11, which is now a third email between Adam Kincaid and Mr. Fiffick dated November 28, 2021, with Bates stamp numbering South Carolina Senate 3246.

(Plaintiffs' Exhibit 6, Email between Adam Kincaid and Mr. Fiffick, Bates South Carolina Senate 3246, marked for identification, as of this date.)

A. Okay.

Q. Do you have any understanding of why Mr. Kincaid sent Mr. Fiffick another email four days later from November 24th with the file labeled Jessamine map?

A. No.

Q. Did you recall looking at the attachment in this November 28th